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 Operations, LLC; Facebook Payments, Inc.;  
 Facebook Technologies, LLC; Instagram, LLC;  
 Siculus, Inc.; and Mark Elliot Zuckerberg*

*Additional parties and counsel listed on  
 signature pages*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT  
 ADDICTION/PERSONAL INJURY  
 PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:  
 ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR-TSH

Honorable Yvonne Gonzalez Rogers

**STIPULATION AND [PROPOSED]  
 ORDER GOVERNING SEALING  
 PROCEDURES**

Plaintiffs and Meta Platforms, Inc., Facebook Holdings, LLC, Facebook Operations, LLC, Facebook Payments, Inc., Facebook Technologies, LLC, Instagram, LLC, Siculus, Inc., and Mark Elliot Zuckerberg; TikTok, Inc. and ByteDance Inc.; Snap Inc.; and YouTube, Inc., Google LLC, and Alphabet Inc. (each a “Party,” and collectively the “Parties”) hereby submit the following Stipulation and [Proposed] Order Governing Sealing Procedures.

WHEREAS, this Court instructed in Case Management Order No. 3 (Dkt. No. 111) that “[i]n large cases, sealing motions can be quite burdensome, overwhelm the docket, and result in additional expense for the parties” and directed the parties to “confer as to a process that will govern in this case and propose a recommendation for the Court’s consideration,” attaching an example of “procedures

that have been endorsed” by the Court (*id.* at 6); and

WHEREAS, parties in other matters pending in this District have, with Court approval, stipulated to modifications of the sealing procedures set forth in the Local Rules to minimize the burdens of multiple sealing requests, *see, e.g.*, Stipulated Order Modifying Sealing Procedures Relating to Plaintiffs’ Motion for Sanctions, *In re Google Play Store Antitrust Litigation*, Case No. 3:20-cv-05671-JD (May 27, 2022) (Dkt. 264) (adopting procedure for omnibus sealing motion to follow completion of briefing on underlying motion); Stipulated Order Modifying Sealing Procedures, *In re Apple iPhone Antitrust Litigation*, Case. No. 4:11-cv-06714-YGR (Dkt. 664) (adopting procedure for omnibus sealing motion to follow completion of briefing on underlying class certification motion and associated filings) (attached as illustrative example to Case Management Order No. 3 (Dkt. No. 111-1) in the instant action.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, SUBJECT TO THE COURT’S APPROVAL:

1. If a Party seeks to file a document (e.g., a brief or exhibit) that contains information designated by a Party (“designating Party”) or third-party (“designating third party”) as “confidential,” then the filing Party may (1) email the document(s) to the Courtroom Deputy Clerk and (2) file on the ECF docket in place of the document(s) containing confidential information a one-page interim slip-sheet indicating that the document(s) have been emailed to the Court and will be sought to be filed under seal for reasons to be discussed in a forthcoming omnibus sealing motion. The interim one-page slip-sheet and the document(s) containing confidential information shall be served on all Parties<sup>1</sup> and on any designating third party whose confidential information is included. For ease of reference, the Parties shall consistently use the same identifier (e.g., Bates number) when referring to a given document produced by a Party or third party containing confidential information.

<sup>1</sup> The Parties shall be served at the following email addresses:  
PSCServiceMDL3047@motleyrice.com (Plaintiffs); MetaNoticeofService@cov.com (Meta Defendants); SnapNoticeofService@mtm.com (Snap, Inc.);  
TikTokNoticeofService@faegredrinker.com (TikTok, Bytedance);  
YouTubeServiceConfidentialDocs@wsgr.com (Google LLC, YouTube, LLC).

2. With the exception of applications for appointment of guardians *ad litem* (addressed in paragraph 6 below), within 10 days of the filing of the interim slip-sheet, each designating Party or third party shall: (1) notify (a) the filing Party and Court of those documents containing its confidential information that may be filed publicly in their entirety and (b) the filing Party of those documents containing its confidential information that should remain filed under seal in their entirety; and (2) provide to the filing Party redacted versions of those documents containing its confidential information that may be filed publicly with appropriate redactions. Within 2 business days after receiving the same, the filing Party shall file on the public docket a notice of filing of each such redacted document, linked to the interim slip-sheet to which it relates, as well as any documents that may be filed publicly in their entirety, unless such documents were otherwise made publicly available through the ECF system.

3. The designating Parties and designating third parties shall, within 14 days following the conclusion of briefing on the motion for which the filing was made (e.g., filings in support of or in opposition to *Daubert* or dispositive motions), jointly file an omnibus sealing motion addressing all documents sought to be sealed, in whole or in part, in connection with the underlying motion. The omnibus sealing motion shall attach provisionally under seal all documents sought to be sealed, and shall include a declaration(s) filed under seal that provides the reasons for sealing. For the Court's ease of reference, the chambers copies of the omnibus sealing motion shall include hyperlinks to the provisionally sealed documents. Each designating Party or third party's respective position in the joint omnibus sealing motion shall not exceed five pages. *See* L.R. 7-11.

4. Any Party who opposes the omnibus sealing motion, in whole or in part, shall file its response within 14 days after said motion is filed. The opposing Party shall have 5 pages in which to respond to each designating Party or third party's position; put another way, the opposing Party's response shall not exceed the product of five pages times the number of Parties and third parties whose documents are at issue. The chambers copy of the opposition(s) shall include hyperlinks to the provisionally sealed documents discussed therein.

5. Within 10 days of the Court's order on the omnibus sealing motion, each designating Party and designating third party shall, as to documents containing its confidential information, apply

1 and provide to the filing Party those redactions approved/ordered by the Court in connection with the  
 2 omnibus sealing motion. Within 2 business days after receiving the same, the filing Party shall file  
 3 on the public docket a copy of each such redacted document as well as any documents that the Court  
 4 ordered unsealed, unless such documents were otherwise made publicly available through the ECF  
 5 system.

6 6. Any Plaintiff who wishes to submit a guardian *ad litem* application to the Court may, at  
 7 their election, send such an application to Plaintiffs' Liaison Counsel, who is directed to submit an  
 8 omnibus sealing motion to the Court, attaching such applications, approximately every 30 days as  
 9 needed. Consistent with this Court's prior guidance (*see* Dkt. No. 164 at 6), applications submitted in  
 10 this manner may be submitted entirely under seal. Upon request by Plaintiffs, Defendants will stipulate  
 11 to entry of a [Proposed] Order granting Plaintiffs' omnibus sealing motion, but do not waive, and  
 12 expressly reserve, their right to seek an order or orders in the future to unseal individual applications  
 13 and/or require parents who wish to proceed pseudonymously going forward make a showing of good  
 14 cause. Plaintiffs and Plaintiffs' Liaison Counsel will review all applications to ensure their accuracy  
 15 and completeness prior to their inclusion in any omnibus sealing motion.

16  
 17 **IT IS SO STIPULATED**, through Counsel of Record.

18  
 19 Dated: March 23, 2023

20 /s/ Previn Warren

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**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: \_\_\_\_\_  
THE HONORABLE YVONNE GONZALEZ ROGERS

**ATTESTATION**

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: March 23, 2023

By: /s/ Ashley M. Simonsen  
Ashley M. Simonsen